

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2011 NOV 17 PM 4:24

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

UNITED STATES OF AMERICA)

v.)

SURURI BARBEE a.k.a. Chris,)
KAREN FLANDERS, EDWARD)
MARTIN CHRETIEN,)
Defendants)

Criminal No.: 5:11-cr-47

SUPERSEDING INDICTMENT

The Grand Jury Charges:

COUNT 1

From in or about March 2011, to in or about April 2011, in the District of Vermont and elsewhere, defendants SURURI BARBEE a.k.a. Chris and KAREN FLANDERS, knowingly and willfully conspired together and with others, known and unknown to the grand jury, to distribute a mixture or substance containing a detectible amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectible amount of cocaine, a Schedule II controlled substance. The offense involved 100 grams or more of a mixture or substance containing a detectible amount of heroin.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B), 846)

COUNT 2

The Grand Jury Charges:

In or about April 2011, in the District of Vermont, the defendant, SURURI BARBEE a.k.a. Chris, did knowingly possess a firearm, that is, a Shooters Arms, FX45 Titan, .45 caliber pistol bearing serial number TB100751, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States.

(18 U.S.C. § 924(c)(1)(A))

COUNT 3

The Grand Jury Charges:

In or about April 2011, in the District of Vermont, the defendant EDWARD MARTIN CHRETIEN, then being an unlawful user of a controlled substance, and then being addicted to a controlled substance, did knowingly receive a firearm, namely, a Shooters Arms, FX45 Titan, .45 caliber pistol bearing serial number TB100751, which had been shipped and transported in interstate commerce.

(18 U.S.C. § 922(g)(3); 18 U.S.C. § 924(a)(2))

COUNT 4

The Grand Jury Charges:

In or about April 2011, in the District of Vermont, the defendant EDWARD MARTIN CHRETIEN, then being an unlawful user of a controlled substance, and then being addicted to a controlled substance, did knowingly receive a firearm, namely, a Beretta, Model 21A, bearing serial number DAA453448, which had been shipped and transported in interstate commerce.

(18 U.S.C. § 922(g)(3); 18 U.S.C. § 924(a)(2))

COUNT 5

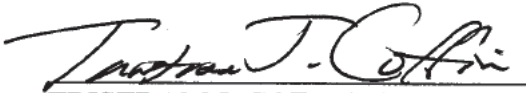
The Grand Jury Charges:

On or about April 20, 2011, in the District of Vermont, the defendant, SURURI BARBEE
a.k.a. Chris, knowingly and intentionally possessed with the intent to distribute a mixture or
substance containing a detectible amount of heroin, a Schedule I controlled substance.

(21 U.S.C. § 841(a)(1))

A TRUE BILL

 
FOREPERSON


TRISTRAM J. COFFIN (WLF)
United States Attorney
Burlington, Vermont
November 17, 2011